US EPA Update

ASARCO HAYDEN PLANT SITE

March 12 and 13, 2013

AGENDA

- 1. Welcome and Introductions
- 2. Superfund Process
- 3. Residential Yard Cleanup Update
- 4. Current Status of Superfund Investigation
- 5. Risk Update

Removal action

Superfund Process

- 1. Preliminary Assessment
- 2. NPL Listing Process
- 3. Remedial Investigation/Feasibility Study
 - Risk Assessment
- 4. Record of Decision
- 5. Remedial Design/Remedial Action
- 6. Construction Completion

Background- EPA Involvement

- ◆ 2006 Phase I Investigation begins and site qualifies for the Superfund National Priorities List (NPL).
- → 2008-2009 Removal and Replacement of Residential soil.

◆ 2008-2012 - Phase 2 Remedial Investigation Workplan Development.

→ 2013 - Phase 2 Remedial Investigation work starts.

Residential Yard Cleanup

Parcels on both towns

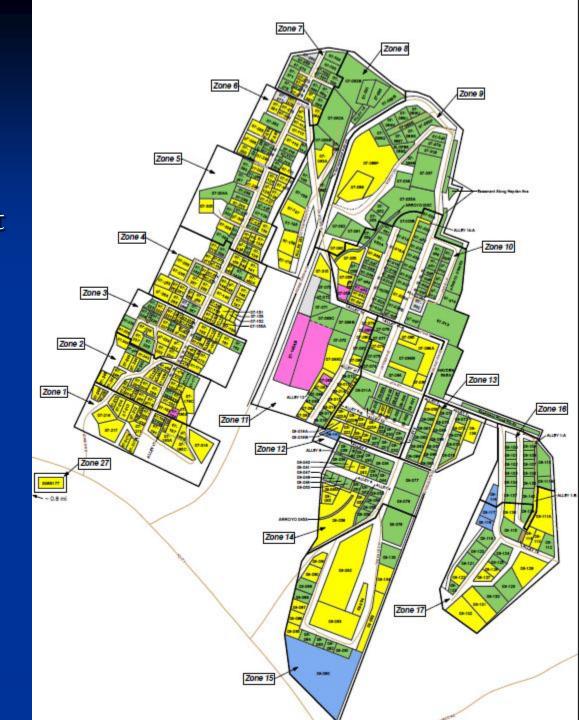
Total number: 658

- Total Sampled: 649
- Total Cleaned up: 266



Residential Yard Cleanup

- EPA/ADEQ oversight
- EPA tracked and approved cleanup of individual properties.



Sewer Replacement

- Entire sewer replacement by city underway
- Trenching occurring across remediated areas
- Care being taken to not expose contaminated soil
- Water to suppress dust



Sewer Replacement

EPA and Asarco
 overseeing
 excavations to assure
 yard soil replacement
 is not undone and
 yard soil remains
 protective.



Remedial Investigation

- Objectives:
 - Determine the nature and extent of contamination
 - Gather enough information to determine a remedy



Remedial Investigation

- Asarco will conduct investigation under EPA oversight.
- Asarco will conduct investigation according to EPA written workplan.
- Investigation includes river water, stormwater, groundwater, soil, and air.



Remedial Investigation

- Phase 2 Investigation will assess the site to determine the extent of contamination from the smelter/concentrator and look at options for addressing the contamination.
- Investigation Areas:

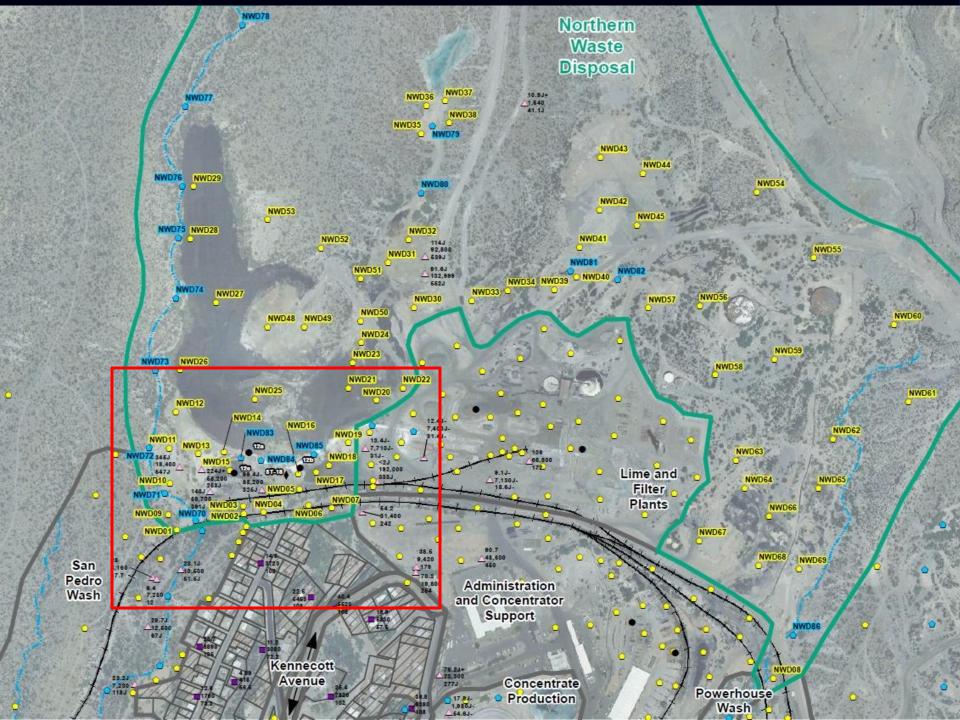
Sampling	Work plan requirements	
Soil	877 locations	
Groundwater	36 wells (6 of which are new) quarterly testing for at least 2 years	
River water	19 locations on Gila and San Pedro Rivers twice a year for 2 years	
Stormwater	14 locations	
Air	35 locations for at least 2 years	

Remedial Investigation Soil

- EPA has found elevated concentrations of metals in neighborhoods.
- New investigation covers all non-residential areas
- Includes tailings piles in town and large piles next to the Gila River





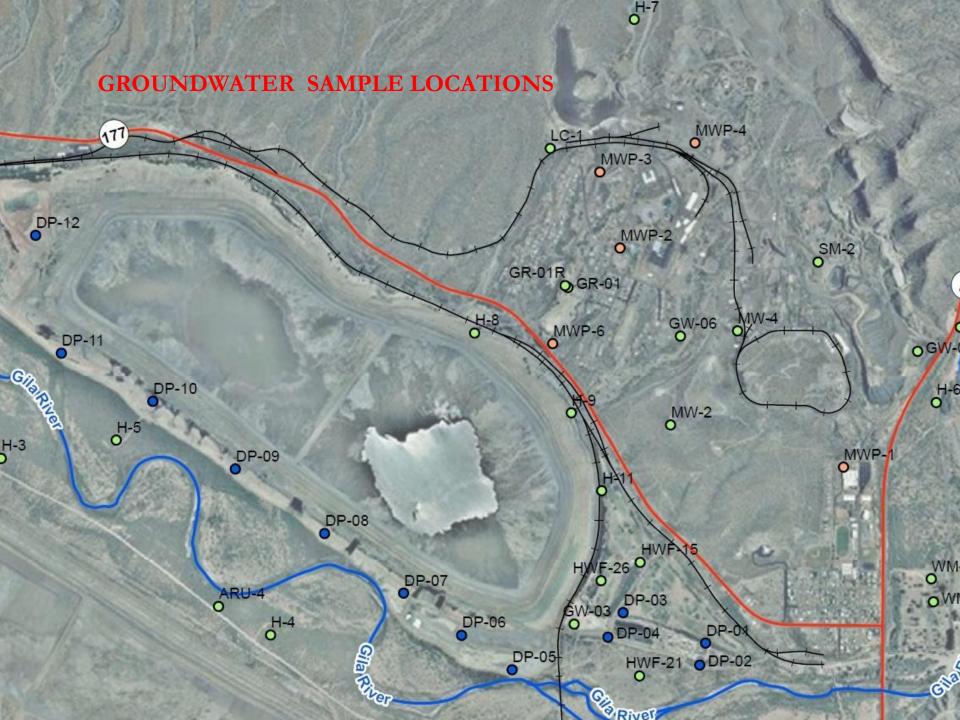




Remedial Investigation Groundwater

- EPA has found elevated concentrations of metals
- New Investigation sampling includes 36 wells (6 newly installed)
- Will look to define the existing contamination





Remedial Investigation Surface water

- Sampling will assess the tailings impacts on the river.
- Will include continuous, high and low flow sampling.







Remedial Investigation Stormwater

- Sampled for the first time this year.
- Will use automatic samplers placed in arroyo
- Will determine impacts to residents who may be exposed





Remedial Investigation Air

- EPA has found elevated concentrations of metals
 - Several years of monitoring (2006-present)
 - Air Monitor near Hayden city hall and on high school in Winkelman



Past Air Sampling Results

ug/m ³	Arsenic	Cadmium	Chromium	Lead
Air Standard*	.00045	.0011	.00016	0.15
Background	<.0004 (ND)	<.0006 (ND)	.00049	.0016
Average	.024	.005	.002	.085
Maximum	190	035	007	0.8
Average Maximum	.189	.005	.002	0.8

Hayden air sampler

^{*} EPA Region 9 Preliminary Remediation Goals

Past Air Sampling Results

Patterns

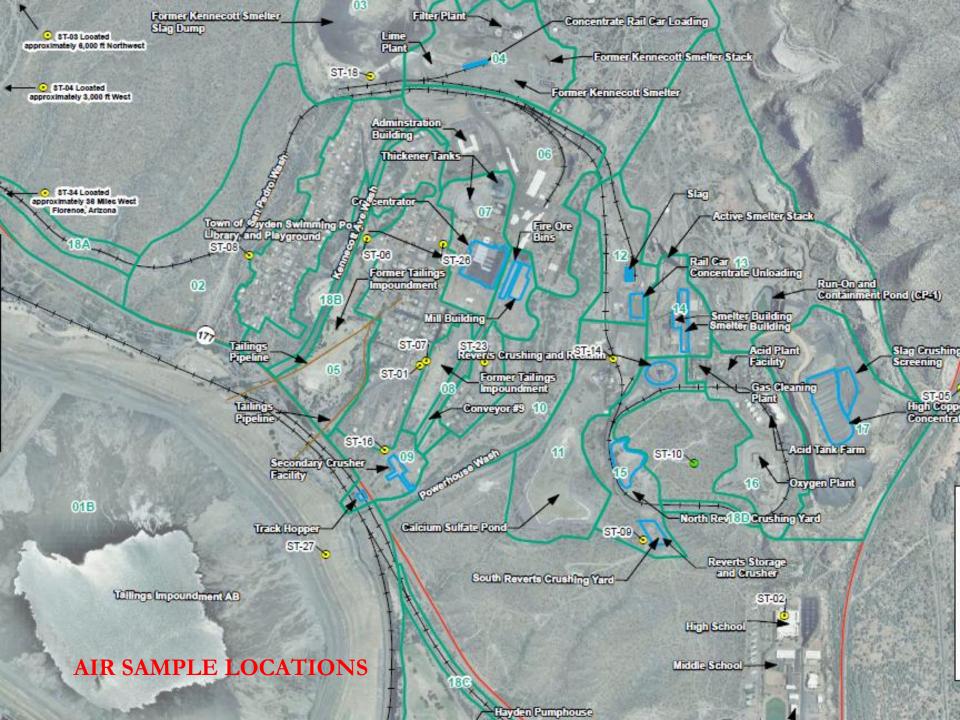
- Particulates are highest when wind is blowing from the large tailings pile and track hopper areas
- Highest levels of Arsenic,
 Lead and Cadmium occur
 when wind is blowing
 from smelter

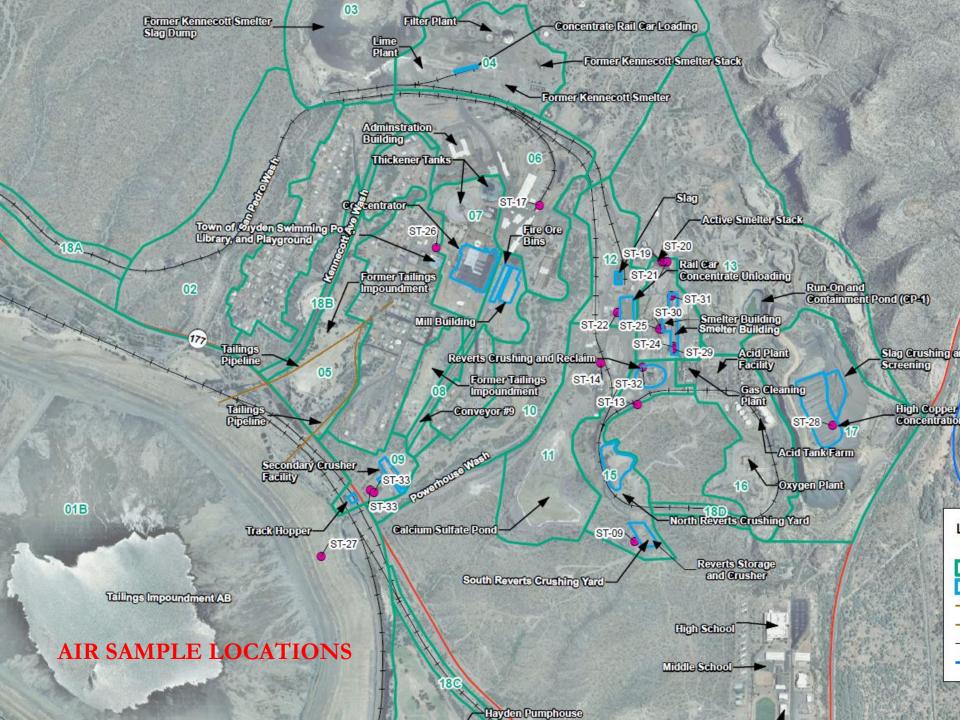




Upcoming air sampling

- Ambient (in town)sampling at 13 locations
- Source sampling (on Asarco property)at up to 19 locations
- Metals and particulates in air
- "Fingerprinting" to determine sources and the effects in town
 - Sources include: flash furnace, converters, anode furnace, slag pours, tailings, concentrate, soil piles, roads, materials handling.
- Monitoring can last up to 2 or more years

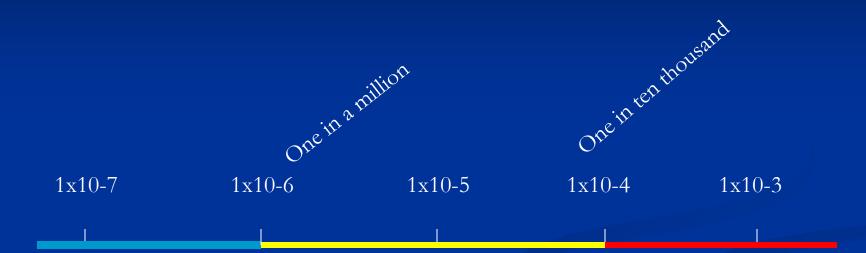




Risk Assessment

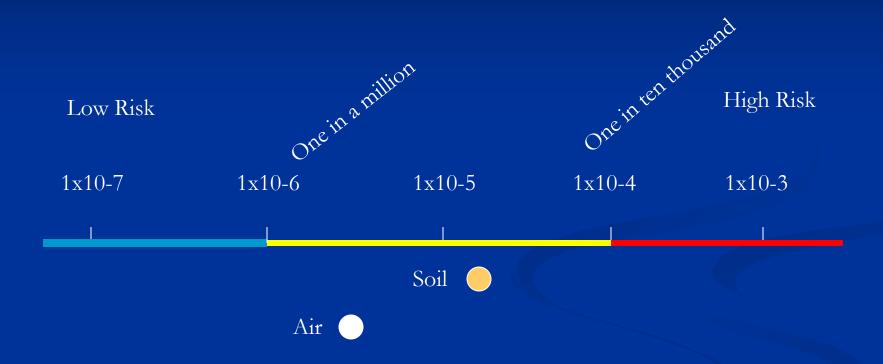
- Toxicity Assessment
 - Non Cancer
 - Lead, copper, arsenic
 - Hazard Index = Daily exposure without adverse effect
 - Harm may occur above a certain dose
 - Cancer
 - Arsenic, cadmium and chromium
 - Risk based
 - Probability of getting cancer over a lifetime
 - Risk can be managed

1x10-7 1x10-6 1x10-5 1x10-4 1x10-3

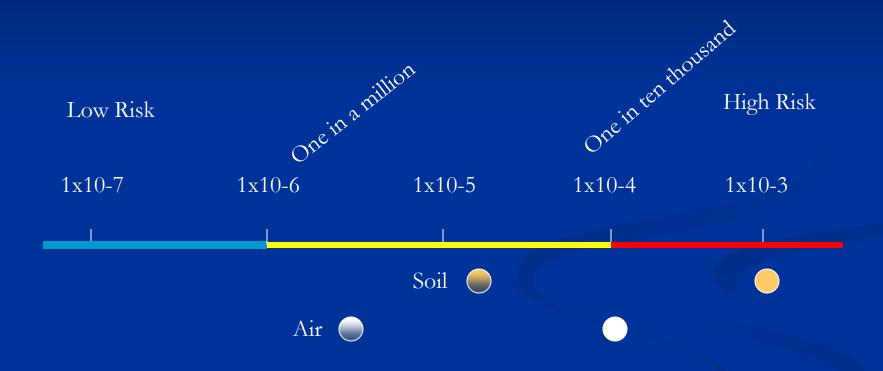




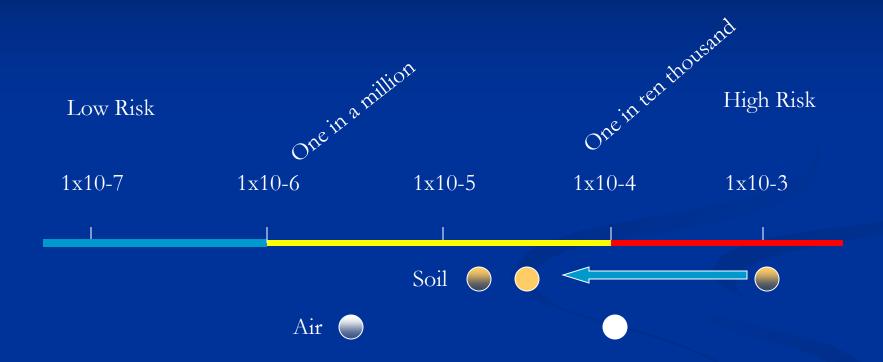
Risk Management Range



Background - Unaffected by Hayden Operations



Hayden



Hayden and Winkelman yard soil replacement

Clean Air Act Finding of Violation

- FOV issued by EPA on November 10, 2011
- FOV alleged that Asarco is in violation of Hazardous Air Pollutant (HAP) requirements at its smelter
- EPA's investigation of the alleged violations is ongoing

Air Regulatory Actions

- Title V Permit
 - Renewal permit to be proposed by Arizona Dept. of Environmental Quality
- Ambient Air Quality
 - Particulate Matter & SO2
 - Hayden does not meet these health based standards
 - ADEQ must develop plan to attain air quality standards at Hayden
 - Must attain (ambient air) within 5 years of designation of nonattainment
- Regional Haze
 - Protects visibility at National Parks & wilderness areas
 - Retrofit technology may be required at smelters, but uncertain at this point what will be required

Next Steps

- Complete soil investigations by end of summer.
- Cleanup worst soil areas, if needed.
- Continue surface water, groundwater and air investigations for next two years.
- Feasibility study to determine best ways to reduce risk in Hayden and Winkelman.
- Interim regulatory or superfund options can be used during or after the current Superfund investigation.

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